A Partnership Including Professional Corporations 600 13th Street, N.W. Washington, D.C. 20005-3096 202-756-8000 Facsimile 202-756-8087 www.mwe.com

Christine M. Gill Attorney at Law cgill@mwe.com 202-756-8283 Boston Chicago London Los Angeles Miami Moscow New York Orange County St. Petersburg Silicon Valley Vilnius Washington, D.C.

MCDERMOTT, WILL & EMERY

OCKET FILE COPY ORIGINAL

December 26, 2000

## **VIA MESSENGER**

Ms. Magalie Roman Salas Office of the Secretary Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554



Re: Southern LINC's E911 Phase II Carrier Implementation Report (CC Docket 94-102)

Dear Ms. Salas:

Transmitted herewith, on behalf of Southern Communications Services, Inc., is a letter responsive to the December 11, 2000 letter from the Wireless Telecommunications Bureau concerning Southern's Phase II E911 implementation plan.

We trust this is responsive to the Commission's inquiry. However, should the Commission require any additional information, please let us know.

Very truly yours,

Christine M. Gill

Enclosure

cc: Wendy Austrie

No. of Copies rec'd O++
List ABCDE

Fouthern LINC

79490 55 Glennidge Ocanector Since 580 canto: Ceorgia 30340 678 445 1500



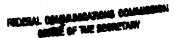
Energy to Serve Your World

December 21, 2000

## **VIA MESSENGER**

Ms. Magalie Roman Salas Office of the Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554 RECEIVED

DEC 26 2000



Re: November 9, 2000, E911 Phase II Carrier Implementation Report (CC Docket 94-102)

Dear Ms. Salas:

Southern Communications Services, Inc. d/b/a Southern LINC<sup>TM</sup> ("Southern") (TRS No. 812395) hereby submits this supplemental implementation report in response to the December 11, 2000, letter from the Wireless Telecommunications Bureau ("WTB") requesting further information regarding Southern's Phase II E-911 implementation plans. Southern has elected to utilize a network-based solution to the Commission's Automatic Location Identification ("ALI") requirements under Phase II of E911 Implementation. Currently, Southern is in the process of selecting a vendor. Southern understands that if an alternative technology is found that will better suit its needs, an amended report must be filed with the Commission within thirty (30) days of the change. (For example, should Southern eventually determine that the optimal solution would be AGPS, it would then find itself in a position similar to that of other iDEN carriers who have requested a waiver of the handset deployment rules.)

In light of Southern's utilization of a network-based solution, the WTB's request for information relating specifically to a handset-based solution, namely, phase-out plans for existing handsets and the location of non-compatible handsets is not relevant and Southern accordingly is not providing information responsive to these two questions.

Ms. Magalie Roman Salas December 21, 2000 Page 2

We trust that this information is responsive to the Commission's inquiry. Should the Commission have any questions concerning this supplemental report, however, please do not hesitate to contact the undersigned.

Very truly yours,

Michael D. Rosenthal

cc: Wendy Austrie

WDC99 365296-1.046333.0012